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December 29, 2021

VIA ECF

The Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 4B South
Brooklyn, New York 11201

Re: Aaron Ross v. Universal Health Services, Inc. et al.
Case No.: 1:21-cv-4424

Dear Judge Gujarati:

This office represents the Plaintiff, Aaron Ross ("Ross") in the above matter. As an initial matter my apologies for not timely filing a response to Defendants' second request for a pre-motion conference.


In response to the arguments set forth in Defendants' December 9, 2021, request, this is to respectfully submit that this matter be transferred to the District Court of Utah for the convenience of the parties and witnesses and in the interests of justice pursuant to 28 U.S. Code § 1406(a) - Change of venue.

As noted on page 3 of Defendants' request, transfer would further the convenience of the parties and witnesses as nearly all of them are located in Utah, citing *Armstrong v. Costco Wholesale Corp.*, 234 F. Supp. 3d 367 (E.D.N.Y. 2017).

It should be further noted that this matter would be timely as the State of Utah has eliminated a statute of limitations for the civil prosecution of child sex abuses.

Respectfully submitted

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